

Sarai L. Thornton, Esq. (SBN 271389)
Sthornton@skanemills.com
SKANE MILLS LLP
1120 Town Center Drive, Suite 200
Las Vegas, Nevada 89144
(702) 363-2535 / Fax (702) 363-2534
Attorney for Defendant Trans Union LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

LORRAINE CAMPBELL,

Plaintiff,

v.

TRANS UNION, LLC, EQUIFAX
INFORMATION SERVICES, LLC, and
JEFFERSON CAPITAL SYSTEMS, LLC,
Defendants.

Case No. 2:24-cv-01401-APG-DJA

**JOINT STIPULATION AND ORDER
EXTENDING DEFENDANT TRANS
UNION LLC’S TIME TO FILE AN
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF’S COMPLAINT
(FIRST REQUEST)**

Plaintiff Lorraine Campbell (“Plaintiff”) and Trans Union LLC (“Trans Union”), by and through their undersigned counsel (collectively, “the Parties”), hereby stipulate as follows:

1. Plaintiff filed the Complaint with the Court on March 27, 2024.
2. Trans Union’s responsive pleading is due on October 1, 2024.
3. Plaintiff and Trans Union are actively engaged in research and assessment of Plaintiff’s allegations to focus their efforts on case-resolution negotiations.
4. Plaintiff does not oppose an extension of Trans Union’s time to Answer the Complaint so that the parties may devote their time to further research and assessment and focus on resolving this matter. Pursuant to Local Rule IA 6-1, Trans Union respectfully requests the Court for an extension of time to file its responsive pleading for 21 days, which is up to and including October 22, 2024.
5. The Stipulation is not meant for delay.

6. This is Trans Union's first extension of time, and the requested extension does not prejudice the parties.

7. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or otherwise respond to Plaintiff's Complaint up to and including October 22, 2024. This is the first stipulation for extension of time for Trans Union to respond to Plaintiff's Complaint.

Dated this 30th day of September 2024.

SKANE MILLS LLP

/s/ Sarai L. Thornton

Sarai L. Thornton, Esq. (SBN 271389)
Sthornton@skanemills.com
1120 Town Center Drive, Suite 200
Las Vegas, Nevada 89144
Telephone: (702) 363-2535
Counsel for Trans Union LLC

CONTEMPORARY LEGAL SOLUTIONS

/s/ Robert M. Tzall

Robert M. Tzall, Esq.
Nevada State Bar No. 13412
2551 North Green Valley Parkway
Building C, Suite 303
Henderson, Nevada 89014
Telephone: (702) 666-0233
office@contemporarylegalsolutions.com

ORDER

The Joint Stipulation for Extension of Time for Trans Union LLC to file an answer or otherwise respond is so ORDERED AND ADJUDGED.

Dated this 1st day of October, 2024.


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of September 2024, I filed **JOINT STIPULATION AND ORDER EXTENDING DEFENDANT TRANS UNION LLC'S TIME TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel:

Robert M. Tzall
office@contemporarylegalsolutions.com
Contemporary Legal Solutions
2551 North Green Valley Parkway
Building C, Suite 303
Henderson, NV 89014
(702) 666-0233
Counsel for Plaintiff

Shannon G. Splaine
ssplaine@lgclawoffice.com
Lincoln Gustafson & Cercos, LLP
7670 W. Lake Mead Blvd., Suite 200
Las Vegas, NV 89128
(702) 257-1997
and
James K. Schultz
jschultz@sessions.legal
Sessions Israel & Shartle, L.L.P.
1550 Hotel Circle North, Suite 260
San Diego, CA 92108-3426
(619) 758-1891
***Counsel for Jefferson
Capital Systems, LLC***

/s/ Pouneh Porooshani

An employee of SKANE MILLS LLP